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BEFORE THE ARIZONA CORPORATION COMMISSION

AZ CORP COMMISSION

DOCKET CONTROL

COMMISSIONERS

SUSAN BITTER SMITH, Arizona Corporation Commission

BOB STUMP

BOB BURNS

DOUG LITTLE

TOM FORESE

DOCKETED

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IN THE MATTER OF THE APPLICATION OF
 UNS ELECTRIC, INC. FOR (1) APPROVAL OF
 A NET METERING TARIFF AND (2) PARTIAL
 WAIVER OF THE NET METERING RULES.

DOCKET NO. E-04204A-15-0099

UNS ELECTRIC'S MOTION TO
 WITHDRAW APPLICATION

On March 25, 2015, UNS Electric, Inc., ("UNS Electric" or "Company") filed with the Arizona Corporation Commission ("Commission") an application for: (1) approval of a new net-metering tariff for future net metered customers that provides monthly bill credits for any excess energy produced from an eligible net metering facility at a "Renewable Credit Rate" and (2) approval of a partial waiver of the Commission's Net Metering Rules (A.A.C. R14-2-2301 *et seq.*) ("Application"). On April 14, 2015, the Commission's Utilities Division ("Staff") filed a Motion to Consolidate ("Staff Motion") the Application with the Company's rate case application anticipated to be filed in early May 2015.¹ In its Staff Motion, Staff asserts that "*addressing the issues raised by the Company in a rate case will allow the parties, and ultimately the Commission, to address the issues more holistically.*"²

For the reasons stated in its Application, the Company believes that it is necessary and in the public interest for the Commission to address the issue of the DG cost shift (even partially) in the near term. As such, the Company requested that the Commission approve the Application by the end of 2015.³ However, the Company is preparing a rate case that will be filed in the

¹ See Docket No. E-04204A-15-0067, UNS Electric's Notice of Intent to File a Rate Case Application.

² Staff Motion at page 2, line 28.

³ Application at page 9, line 14 and page 10 at line 13.


1 immediate future. This rate case is anticipated to be concluded in approximately one year⁴.
2 Therefore, even though a rate case is not legally required for the Commission to grant the relief
3 requested in the Company's Application, UNS Electric is willing to accept Staff's request and
4 have the issues set forth in its Application decided as part of the Company's rate case. Because
5 the rate case filing will propose the same net metering tariff and waivers as part of the relief
6 sought in the rate case, the need for the Application is moot and duplicative thereby negating the
7 need for it to be consolidated with the rate case docket. Accordingly, UNS Electric requests
8 withdrawal of its Application and that it be dismissed without prejudice.⁵

9 This Motion to Withdraw Application is predicated solely on the timing of UNS Electric's
10 rate case application and the need for the issues and requested relief set forth in the Application to
11 be addressed by the Commission sooner rather than later. But for such events and anticipated
12 timing, the Company would oppose any efforts to delay Commission consideration of these
13 important issues and to require the filing of a rate case earlier than necessary solely for the purpose
14 of addressing issues that can be considered without the need and expense of a rate case.

15 RESPECTFULLY SUBMITTED this 20th day of April, 2015.

16 UNS Electric, Inc.

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18 By



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27 ⁴ See Notice of Intent to File a Rate Case Application at page 3 lines 4-11.

⁵ UNE Electric reserves the right to re-file the Application should the resolution of its rate case be delayed.

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2 Original and thirteen copies of the foregoing
3 filed this 20th day of April, 2015, with:

4 Docket Control
5 Arizona Corporation Commission
6 1200 West Washington Street
7 Phoenix, Arizona 85007

8 Copy of the foregoing hand-delivered
9 this 20th day of April, 2015, to:

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